

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
HAZARDOUS WASTE INSPECTION REPORT

EPA

DWM-029

HAZARDOUS WASTE MANAGEMENT FACILITY INSPECTION REPORT

FACILITY INFORMATION

FACILITY NAME: Cookson Pigments (Heubach Inc)FILE NUMBER: 07-14-171

VHT FACILITY FILE NUMBER: _____

PERMIT #: _____

REGION: MetroINSPECTION DATE: 12/12/89

INCIDENT/CASE NUMBER: _____

INSPECTION TYPE: TSD/LB RCRA

RESPONSIBLE AGENCY CODE: _____

INSPECTOR'S NAME: Gary GreulichINSPECTOR'S AGENCY: DEPINSPECTOR'S BUREAU: HWMEPA ID NUMBER: NJD002190627

ADDRESS:

256 Vanderpool St.Newark, N.J. 07114LOT: 27 BLOCK: 1172COUNTY: EssexFACILITY PERSONNEL: Ralph W. HenningsTELEPHONE #: (201) 596-6242 Senior EngineerOTHER STATE/EPA PERSONNEL: Baleslaw CracherREPORT PREPARED BY: Gary GreulichREVIEWED BY: ASTDATE OF REVIEW: 1/23/90

JAN 03 REC'D

() YES (☒) NO

() YES (☒) NO

—

(☒) YES (☐) NO

Manifests Not in Compliance:

SUMMARY OF FINDINGSFACILITY DESCRIPTION AND OPERATIONS

On Dec 12, 1989 Boleslaw Czachor and myself conducted a RCRA inspection at Cookson Pigments (formerly Heubach) at 256 Vanderpool St. Newark. Our contact at the facility was Ralph Hennings, Senior Engineer. Mr. Hennings informed us that Cookson is a manufacturer of inorganic and organic paint pigment. The facility employs approx. 350 people in all working 5 days a week 3-8 hour shifts per day. Until Jan 26, 1984 the property was owned by DuPont then became Heubach. On July 1, 1989 company assets were sold to Cookson Pigments.

Mr. Hennings explained the plant process as the combining of nitrates, phosphates, chromates, sulfates, acids, hydroxides and others to produce one of four base color (red, blue, green or yellow). The pigment now in its liquid form is dried and the resin is pulverized to powder form. These powders are then mixed to achieve the pigment color ordered by customer. All pigments produced by the company are water based there is no solvent based pigments produced at this facility.

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS

Hazardous waste is generated on site through one of four processes, D008, K002 and F003 are the three hazardous wastes generated by the facility. F003 is generated in the laboratory. A small amount of pigment is mixed with toluene or acetone and checked against a color chip supplied by customer to verify color match. The discarded color chip and company sample are drummed and disposed of as F003. Ethyl acetate is used to clean the small mixing vessel and other lab equipment and is also discarded in a similar manner as F003. The company's K002 waste (solid) is a byproduct of process tank cleanouts. A series of floor drains that run through out the plant collect all liquid material from the plant. The waste stream (inorganic liquid) goes through a series of presses first to remove any usable pigment then into tank V-201 for pH adjustment with nitric acid. From here the effluent flows to a holding tank where $Pb(NO_3)_2$ is added to produce $Pb(NO_3)_2 + CrO_4^{2-} \rightarrow PbCrO_4 + 2NO_3^-$. The $PbCrO_4$ is then filtered out through

SUMMARY OF FINDINGSFACILITY DESCRIPTION AND OPERATIONS

presses. The effluent then proceeds to another tank where Na_2CO_3 is added to produce PbCO_3 which is recycled. The remaining effluent is discharged to PVSC. The organic liquid is treated with sulfuric acid and caustic soda solution before discharging to PVSC. (See attached diagram)

The D008 that is produced by the company is actually product. Off spec paint pigment that can not be recycled in house is waste, a hazardous waste. All product that is considered unusable is labeled as a hazardous waste and shipped off site as such. Also shipped off site as D008 is all cleanouts from dust collectors that are through out the entire plant.

Hazardous Waste on Site:

F003 2-55 gallon drums

D008 14-55 gallon drums

At the time of inspection there were only 16 drums of Hazardous waste on site

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS

being as the company held a shipment
a day before. The company produces
about 100 drums of D008, 2300 drums
per M of K002 and 5-6 drums per M
of F003.

Past Enforcement History

On Sept 30, 1987 then Heubach was
issued K001 for failing to familiarize
local hospitals with properties of haz. waste
handled and failure to submit contingency
plan to local authorities. Heubach also had
one manifest that was improperly classified
as D001 instead of F003. The companies
problems were corrected as N.F.A. was
required to K001's on Oct 5, 1987.

Permits

Johnson Rigments has air permit, ust, ASPDES
and sewer permits

ASPDES #0028207 surface water drain
PVS# #20404642 and #20404641

LAST #0050483 permits for gas tank +

Storage tank before discharging to PVS#

Air Permits see attached list

SUMMARY OF FINDINGSFACILITY DESCRIPTION AND OPERATIONSOverall + NOV's

The plant and company paper work all appeared in good order except for the following discrepancies. During original inspection Mr. Hennings was informed that L.B. notification on manifested F003 wastes. Mr. Hennings stated that STK handled all paper work concerning F003 waste and he would contact them for copies for his office files. On 12/20/89 while at Cookson to clarify a manifest question Mr. Hennings showed me copies of L.B. notice attached to all F003 waste manifest originally questioned. The question about manifest concerned manifested waste to Canada (Nova Lead) which he had the proper paper work for but did not come up on computer manifest check. A call to manifest section in Trenton showed that there was no number to enter Canadian TSD into computer and that all shipments to Canada were contained in a separate file.

Cookson was issued a NOV for NSAC 7.26 - 9.8(d) failure of company to submit registered professional engineer certification that facility followed approved closure plan. Cookson, then Heubach, started delisting procedure in 1987.

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS

A plan was submitted and followed. The last letter in file was dated May 1988 and requested more information. The information was submitted to Engineering. Mr. Hennings had a receipt for the work that was done which he submitted and it was his belief that the company was now deleted. By giving this now it was hoped the process could be opened back up and the process finished. Cookson was given 30 days (Jan 12, 1990) to come into compliance. At that time the need for further enforcement will be needed if compliance is not achieved.

Note: Previously unaddressed in this report but an area that should be explained is 7 shipments of Dooe Codium. These shipments are part of an EICRA cleanup by DuPont (EICRA case 88-741, 88-558). As part of sale agreement DuPont was to be responsible for ongoing soil cleanup which is where the Dooe was generated.

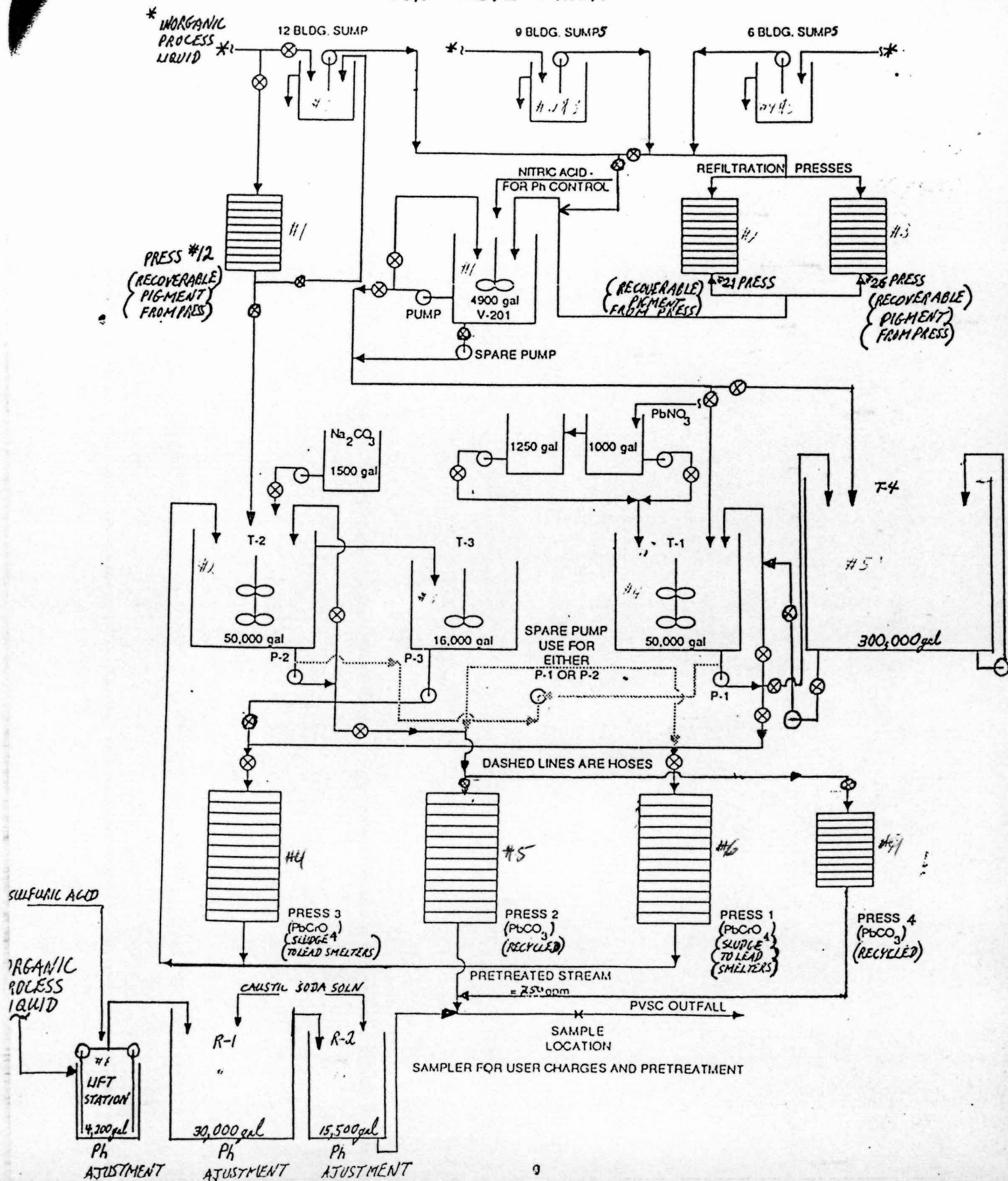
#	J. STACH	PERMIT	CERTIF.	# DELETED	EXPIRATION DATE	APPLICATION LOG #	DATE	APPROVAL	STATUS	CODE	EQUIPMENT DESIGNATION
4	63022	6/8/91									#12 BLDG. - SCHWIEBLE SCRUBBER
5	DELETED										#34 BLDG. - GENERAL EXHAUST DUST COL.
6	11089	7/1/94									#34 BLDG. - GENERAL EXHAUST DUST COL.
7	DELETED										#34 BLDG. - GENERAL EXHAUST DUST COL.
8	81345	10/21/93									#6 BLDG. - ROTOLONE
9	43305	6/18/94									#6 BLDG. - KROLOR DUMP HOOD - YELLOW
10	DELETED										
11	DELETED										
12	37249	11/17/93									#12 BLDG. - DRY TRAY DUMP DUST COL.
13	18103	2/27/91									#123 BLDG. - NORTH PULVERIZER PROD. COL.
14	18104	2/27/91									#123 BLDG. - SOUTH PULVERIZER PROD. COL.
15	18105	2/27/91									#123 BLDG. - VACUUM SYSTEM
16	18106	2/27/91									#123 MICRIZOMIZER PROD. COLLECTOR
17	18107	4/21/91									#123 BLDG. - GENERAL DUST COLLECTOR (GENERAL)
18	18214	2/18/91									#123 BLDG. - 2nd FLOOR INTERNAL EXHAUST
19	85800	T-10/12/89		1/10/90							#1 BOILER
20	65617	9/15/93									TANK-430 - ACETIC ACID STORAGE
21	88739	T-10/8/89		11/6/90							#6, #9 & #13 BLDG. AZO SCRUBBER (GENERAL)
22	46308	8/15/90									#6 BLDG. - VAC-388 - SEPARATE SOLUTION
23	48635	9/11/91									#123 BLDG. - WEST BLENDER TONIT DUST COL.
24	49441	4/15/91									#34 BLDG. - 8 BLENDER TONIT DUST COL.
25	51719	3/4/94									#12 BLDG. - VACUUM SYSTEM
26	51615	9/21/91									#123 BLDG. - EAST BLENDER TONIT DUST COL.
27	67010	12/8/93									#34 BLDG. - 1 PULVERIZER (TONIT) RELIEF
28	69465	9/10/94									#34 BLDG. - 2 PULVERIZER (TONIT) RELIEF
29	69466	9/10/94									#34 BLDG. - 4 PULVERIZER (TONIT) RELIEF
30	69467	9/10/94									#34 BLDG. - 5 PULVERIZER (TONIT) RELIEF
31	69468	9/10/94									#34 BLDG. - 8 PULVERIZER (TONIT) RELIEF
32	69469	9/10/94									#34 BLDG. - 9 PULVERIZER (TONIT) RELIEF
33	69470	9/10/94									#34 BLDG. - 10 PULVERIZER (TONIT) RELIEF
34	60278	12/28/91									#12 BLDG. - TANK. #22A
35	60685	3/23/92									#12 BLDG. - TANK. #19 - DUST COLLECTOR
36	71728	1/3/93									#12 BLDG. - BAUER MILL PRODUCT COLLECTOR(S)
37	6/F										TANK-664-1 OIL STORAGE (10,000 GAL)
38	6/F										TANK-580-1 OIL STORAGE (10,000 GAL)
39	6/F										TANK-639-1 OIL STORAGE (10,000 GAL)
40	62471	8/19/92									#6 BLDG. - CFC/HF EXHAUST
41	62472	8/19/92									#10 BLDG. - QA/HF EXHAUST
42	62837	13/29/92									#34 BLDG. - 17 BLENDER EXHAUST (TONIT)

I. J. STACK #	PERMIT CERTIF. #	EXPIRATION DATE	APPLICATION LOG # & DATE	APPROVAL STATUS CODE	EQUIPMENT DESIGNATION
43	63806	2/24/93			#34 BLDG. - #4 BLENDER EXHAUST (TORIT)
44	63474	2/24/93			#34 BLDG. - #6 BLENDER EXHAUST (TORIT)
45	63626	2/24/93			#34 BLDG. - #5 BLENDER EXHAUST (TORIT)
46	85735	7/10/6/89	1/4/90		#8 BLDG. - LEAD NITRATE SCRUBBER SYSTEM
47	67011	12/8/93			#34 BLDG. - #10 BLENDER EXHAUST (TORIT)
48	68391	1/2/93			#6 BLDG. - KROLOX DUMP HOOD - ORANGE
49	68549	6/13/94			LEAD SHOP YARD - VAT 421 CAUSTIC SODA TANK VENT
50	68550	6/13/94			LEAD SHOP YARD - VAT 424 LEAD NITRATE TANK
51	68551	6/13/94			#12 BLDG. YARD - VAT 429 NITRIC ACID TANK
52	68895	6/13/94			#12 BLDG. YARD - VAT 102-1 SODIUM BICHRIMATE TANK
53	68896	6/13/94			#12 BLDG. YARD - VAT 102-2 SODIUM CHROMATE TANK
54	68552	6/13/94			#12 BLDG. YARD - VAT 102-3 SULFURIC ACID TANK
55	68553	6/13/94			#12 BLDG. YARD - VAT 102-4 MURIATIC ACID TANK
56	68554	6/13/94			#12 BLDG. YARD - VAT 102-5 SODIUM NITRATE TANK
57	68555	6/13/94			#37 BLDG. YARD - TANK #827-1 SODIUM HYDROXIDE TANK
58	68897	6/13/94			#12 BLDG. YARD - TANK #428 SODIUM CHROMATE TANK
59	69610	1/19/92			#22 BLDG. YARD - PAINT SPRAY BOOTH #2
60	69010	8/3/94			#13 BLDG. - BALL MILL PRODUCT COLLECTOR
61	77412	1/21/93	Deleted	→	#13 BLDG. - #1 & #2 BALL MILLS & PRODUCT PALLETS
(62)	G/F				#7, 18 & 126 BLDGS. - BATCH DRYERS #66 & 67, 68 & 69, 70 & 71, 72 & 73, 74 & 75, 76 & 77, 78 & 79, 156 & 157, 158 & 159, 160 & 161, 162 & 163, 164 & 165, 166 & 167, 168 & 169, 12 & 13, 14 & 15, 16 & 17, 18 & 19, 20 & 21, 22 & 23, 24 & 25, 26 & 27, 28 & 29, 30 & 31, 32 & 33, 34 & 35, 36 & 37, 38 & 39, 40 & 41, 42 & 43, 44 & 45, 46 & 47, 48 & 49, 50 & 51, 52 & 53, 54 & 55, 56 & 57, 58 & 59, 60 & 61, 62 & 63, 64 & 65, 124 & 125, 126 & 127, 128 & 129, 130 & 131, 132 & 133, 134 & 135, 136 & 137, 138 & 139, 140 & 141, 142 & 143, 144 & 145, 146 & 147, 148 & 149, 150 & 151, 152 & 153, 154 & 155, 80 & 81, 82 & 83, 84 & 85, 86 & 87, 88 & 89, 90 & 91, 92 & 93, 94 & 95, 96 & 97
2 THROUGH 27 ALL RANDFATHERED					BATCH DRYERS ↑
(127)	G/F				LEAD SHOP YARD - TANK 420 - LEAD NITRATE STORAGE
128	68548	6/13/94			#12 BLDG. YARD - VAT 102-6 97% SULFURIC ACID TANK
129	DELETED				#37 BLDG. YARD - TANK #835-1
130	70416	12/17/89			#37 BLDG. YARD - TANK #837-1
131	70448	12/16/91			
132	70449	12/16/91			

[illegible]

#	I.T. STACK	PERMIT #	CERTIF. #	EXPIRATION DATE	APPLICATION LOG #	APPROVAL STATUS	CODE	EQUIPMENT DESIGNATION
183	88742	T-10/8/89	01885177	2/27/90	*13BLOC - BALL MILL #3 & SIEVE BLADE MIXERS *3 & 4 UNIT HOPERS AND FEEDERS			
184	88743	T-12/05/89	01892697	7/29/89	*17BLOC - DUST COLLECTOR FOR #2 CONT. IN			
178	091717		01892697	7/29/89	*17BLOC - BOILER #2 STACK			
150	091397		01892698	7/29/89	*17BLOC - BOILER #3 STACK			
			2184492	11/21/86	*12 BLOC - BLENDER'S PAKTER & REL. EQUIP.			
			7184492	11/21/86	*36 BLOC - LEAD OXIDE SILD DUST COLLECTOR			

HEUBACH INC. PRETREATMENT SCHEMATIC FOR WASTE WATER



HAZARDOUS WASTE FACILITY STANDARDSYES NO N/A

MANIFESTS

7:26-7.4(a)4

Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient on G-1).

7:26-7.4(a)4i

The generator's name, address and phone number.

7:26-7.4(a)4ii

The generator's EPA ID number.

7:26-7.4(a)4iii

The hauler(s) name, address phone number and NJ registration.

7:26-7.4(a)4iv

The hauler(s) EPA ID number.

7:26-7.4(a)4v

The name, address and phone number of the designated TSD facility.

7:26-7.4(a)4vi

The TSF's EPA ID number.

7:26-7.4(a)4v

The name, address and phone number of the designated TSD facility.

7:26-7.4(a)4vii

The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same?

7:26-7.4(a)4viii

Special handling instructions and any other information required on the form to be shipped by generator?

no EPA
ID# for Canada TSD

YES	NO	N/A
—	—	—
✓	—	—
✓	—	—
✓	—	—
✓	—	—
✓	—	—
—	—	✓
✓	—	—
✓	—	—
✓	—	—

YES NO N/A

7:26-7.4(3)	Did the generator describe all N.O.S. wastes in Section J?	—	—	✓
7:26-7.4(a)ix	When shipping hazardous waste to a waste reuse facility does the generator enter the waste reuse facility I.D. # in the section G of the Uniform Manifest?	—	—	✓
7:26-7.4(a)5	Before allowing the manifested waste to leave the generator's property, did the generator:	✓	—	—
7:26-7.4(a)5i	Sign the manifest certification by hand?	✓	—	—
7:26-7.4(a)5ii	Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest?	✓	—	—
7:26-7.4(a)5iii	Retain one copy and forward one copy to the state of origin and one copy to the state of destination?	—	✓	—
7:26-7.4(a)5iv	Provide the required numbers of copies for: generator, each hauler, owner/operator of the designated facility, as well as one copy returned to the generator by the facility owner/operator?	✓	—	—
7:26-7.4(a)5v	Give the remaining copies of the manifest form to the hauler?	✓	—	—
7.26-7.4(f)	Has the generator maintained facility records for three (3) years? (Manifest(s), exception report(s) and waste analysis)	✓	—	—
7:26-7.4(h)1	Has the generator received signed copies of portion B (from the TSD facility) of all manifests for waste shipped off site more than 35 days ago?	✓	—	—
7:26-7.4(h)1	If not: Did the generator contact the hauler and/or the owner or operator of the TSDF and the NJDEP at (609) 292-8341 to inform the NJDEP of the situation?	—	—	✓
7:26-7.4(h)2	Have exception reports been submitted to the Department covering any of these shipments made more than 45 days ago?	—	—	✓

YES NO N/A

7:26-9.4(b)	Waste Analysis			
7:26-9.4(b)11	Is there a detailed chemical and physical analysis of a representative sample of the waste(s) or each waste? (At a minimum, this analysis must contain all the information necessary for proper treatment storage or disposal of the waste).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(b)1111	Does the character of the waste handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? Check only one:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Waste characteristics vary:			
	All waste(s) are basically the same:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Company treats all waste(s) as hazardous:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(b)2	Is there a written waste analysis plan at the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Does it contain:			
7:26-9.4(2)1	Parameters for which each hazardous waste stream will be analyzed including constituents listed in NJAC 7:26-8.16 and the rationale for the selection of these parameters?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(b)211	The test methods which will be used to test for these parameters?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(b)2111	The sampling method which will be used to obtain a representative sample of the waste to be analyzed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(b)21v	The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(b)2v	For off-site facilities, the waste analysis that hazardous waste generators have agreed to supply?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7:26-9.4(b)2v11	Procedures which will be used to identify changes in waste stream characteristics?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Does hazardous waste come to this facility from an outside source? (e.g., another generator).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	If yes, list the name(s) of generators.			

If waste comes from an outside source, are there procedures in the waste analysis plan to insure that waste received conforms to the accompanying manifest?

— — — ✓

The procedures which will be used to determine the identity of each shipment of waste managed at the facility?

The sampling method which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling?

— — +

Did the facility accept hazardous waste which it is not authorized to handle?

— — +

Are all records and results of waste analysis performed pursuant to NJAC 7:26-9.4(b) and 9.4(e) as applicable written in the operating log?

— — +

Security

Does the facility have:

A 24 hour surveillance system which continuously monitors and controls entry onto the active portion of the facility?

✓

An artificial or natural barrier, which completely surrounds the active portion of the facility; and a means to control entry, at all times, through the gates or other entrances to the active portion of the facility?

✓

Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?

✓

If no, explain what measures are taken for security.

YES NO N/A

7:26-9.4(f) General Inspection Requirements

7:26-9.4(f)1 Does the owner or operator inspect the facility for malfunctions and deterioration, operator errors and discharges which may be causing, or may lead to:

7:26-9.4(f)1i Discharge of hazardous waste constituents to the environment?

7:26-9.4(f)1ii A threat to human health?

7:26-9.4(f)3 Has the owner or operator developed, and does the owner or operator follow a written schedule for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are utilized for the prevention, detection or response to environmental or human health?

7:26-9.4(f)3i Did the owner or operator submit the written inspection schedule to the department?

If yes, when was it submitted?

7:26-9.4(f)3iii Is the written inspection schedule kept at the facility?

7:26-9.4(f)3iv Does the schedule identify the types of problems to be looked for during the inspection?

7:26-9.4(f)3v Does the schedule include the frequency of inspection, based upon the rate of possible deterioration of the equipment and the probability of an environmental, or human health incident if the deterioration or malfunctions or any operator error goes undetected between inspections?

7:26-9.4(f)5 Is there evidence that problems reported in the inspection log have not been remedied?

7:26-9.4(f)6 Does the owner/operator record inspections in a log?

✓ — —

✓ — —

✓ — —

— ✓ —

— — ✓

✓ — —

✓ — —

✓ — —

✓ — —

✓ — —

YES NO N/A

7:26-9.4(f)6	Are these records kept for at least three (3) years from the date of inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(f)6	Does the records include the date, and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial action?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(g)	<u>Personnel Training</u>			
	Have facility personnel successfully completed a program of classroom instruction or on-the-job training within six months of having been employed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(g)2	Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(g)5	If yes, have facility personnel taken part in an annual review of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Is there written documentation of the following:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(g)6i	Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(g)6ii	A written job description for each position related to hazardous waste management?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(g)6iii	A written description of the type and amount of both introductory and continuing training given to personnel in jobs related to hazardous waste management?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(g)6iv	Documentation of actual training or experience received by personnel?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

YES NO N/A

7:26-9.4(g)7

Are training records kept on all current employees until closure of the facility and training records kept on former employees for three years from their last date of employment?

✓ _ _

7:26-9.4(g)8

Are semi-annual drills conducted involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures development pursuant to NJAC 7:26-9.7?

✓ _ _

7:26-9.6

Preparedness and Prevention

Does the facility comply with preparedness and prevention requirements including maintaining:

7:26-9.6(b)1

An internal communications or alarm system?

✓ _ _

7:26-9.6(b)2

A telephone or other device to summon emergency assistance from local authorities?

✓ _ _

7:26-9.6(b)3

Portable fire equipment, spill control equipment, and decontamination equipment?

✓ _ _

7:26-9.6(b)4

Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems?

✓ _ _

7:26-9.6(c)

Is equipment tested and maintained?

✓ _ _

7:26-9.6(d)1

Is there immediate access to communications or alarm systems during handling of hazardous waste?

✓ _ _

7:26-9.6(e)

Adequate aisle space to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment?

_ _ ✓

If no, please explain.

Inspection
Done by
Grinnell Fire
Protection Systems
Company

YES NO N/A

In your opinion, do the types of waste on site require all of the above procedures, or are some not required?

✓ — —

Explain.

7:26-9.6(f)

Has the facility made the following arrangements, as appropriate for the type of waste handled on site?

✓ — —

7:26-9.6(f)1

Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled?

✓ — —

7:26-9.6(f)2

Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority?

— — ✓

7:26-9.6(f)3

Clean Venture

Agreements with emergency response contractors, and equipment suppliers?

✓ — —

7:26-9.6(f)4

Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or discharges at the facility?

✓ — —

7:26-9.6(f)5

Arrangements with local fire departments to inspect the facility on a regular basis with at least two inspections annually?

✓ — —

7:26-9.7

Contingency Plan and Emergency Procedures

7:26-9.7(a)

Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water?


✓ — —


YES NO N/A


- 7:26-9.7(b) Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? ☒ ☐ ☐
- 7:26-9.7(c) Does the contingency plan describe the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility? ☒ ☐ ☐
- 7:26-9.7(d) Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or 151 or a Discharge Prevention, Containment and Countermeasure (DPCC) Plan in accordance with NJAC 7:1E-4.1 et seq.? ☒ ☐ ☐
- If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this section? ☒ ☐ ☐
- 7:26-9.7(e) Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services? ☒ ☐ ☐
- 7:26-9.7(f) Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up-to-date? Where more than one person is listed, one shall be named as primary emergency coordinator and others shall assume responsibility as alternates? ☒ ☐ ☐


YES NO N/A

- 7:26-9.7(g) Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required? Is the list kept up-to-date? In addition, does the plan include the location and a physical description of each item on the list, and a brief outline of its capabilities?
- 7:26-9.7(h) Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires)?
- 7:26-9.7(i) Is a copy of the contingency plan and all revisions to the plan:
1. Maintained at the facility; and
 2. Has the contingency plan been submitted to local authorities (police, fire departments, emergency response teams)?
- 7:26-9.7(k) Is there at least one employee on site or on call with the responsibility of coordinating all emergency response measures?
- 7:26-9.8 Closure Plan
- 7:26-9.8(c) Does the facility have a written closure plan?
- Does the owner/operator keep a written copy of the closure plan and all revisions to the plan at the facility?
- If yes, does the plan include:


 _ _ _


 _ _ _


 _ _ _


 _ _ _


 _ _ _


 _ _ _


 _ _ _

YES NO N/A

7:26-9.8(e)11

A description of how and when the facility will be partially closed (if applicable) and ultimately closed?

— ✓ —

7:26-9.8(e) 111

The maximum extent of the operation which will be open during the life of the facility?

— — —

7:26-9.8(e)2

An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the life of the facility?

7:26-9.8(e)3

A description of the steps needed to decontamination facility equipment during closure?

✓

7:26-9.8(e)4

A schedule for final closure including the anticipated date when the wastes will no longer be received, the date when completion of final closure is anticipated, and intervening milestone dates which will allow tracking of the progress of closure?

— — —

Post Closure Plan

7:26-9.9(g)

Does the facility have a written post-closure plan kept at the facility?

— — h

If yes, does the plan:

7:26-9.9(1)

Identify the activities which will be carried on after closure and the frequency of these activities?

— — — 1

7:26-9.9(1)1

Include a description of the planned ground water monitoring activities and frequencies at which they will be performed?

— — —

7:26-9.9(1)2

Include a description of the planned maintenance activities, and frequency at which they will be performed, to insure the following:

— — —

7:26-9.9(1)21

The integrity of the cap and final cover or other containment structures where applicable?

— — —

7:26-9.9(1)211

Describe the function of the facility monitoring equipment?

YES NO N/A

7:26-9.9(1)3

Include the name, address and phone number of a person or office to contact about the disposal facility during the post-closure period?

Does the owner/operator have a written estimate of the cost of post-closure for the facility?

If yes, what is it?

Please circle all appropriate activities and answer questions in appropriate sections all activities circled.

Storage	Treatment	Disposal
<u>Container</u>	Tank	Landfill
Tank, Above Ground	Surface Impoundments	
Tank, Below Ground	Incineration	Surface Impoundments
Surface Impoundments	Thermal Treatment	Other _____

Waste Piles

Other _____ Chemical, Physical and Biological Treatment

Other _____

7:26-9.4(d)

Containers

What type of containers are used for storage? Describe the size, type, quantity and nature of wastes (e.g., 12 fifty-five gallon drums of waste acetone).

55 gallon drums F003 D008

7:26-9.4(d)11

sligbacks - H002
Do the containers appear to be of sturdy leakproof construction of adequate wall thickness, weld, hinge and seam strength, and of sufficient material strength to withstand side and bottom shock, while filled, without impairment of the container's ability to contain hazardous waste?

If no, explain.

YES NO N/A

- 7:26-9.4(d)111 Are the lids, caps, hinges or other closure devices of sufficient strength that when closed, they will withstand dropping, overturning or other shock without impairment of the container's ability to contain hazardous waste? ☒ ☐ ☐
- If no, explain.
- 7:26-9.4(d)2 Do the containers appear to be in good condition, not in danger of leaking? ☒ ☐ ☐
- 7:26-9.4(d)2 If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.
- 7:26-9.4(d)3 Are hazardous wastes stored in containers made of compatible materials? ☒ ☐ ☐
- 7:26-9.4(d)41 Are all containers securely closed, except those in use, so that there is no escape of hazardous waste or its vapors? ☒ ☐ ☐
- If no, explain.
- 7:26-9.4(d)4111 Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking? ☒ ☐ ☐
- If no, explain.
- 7:26-9.4(d)iv Are containerized hazardous wastes segregated in storage by waste type? ☒ ☐ ☐
- 7:26-9.4(d)v Are containerized hazardous wastes arranged so that their identification label is visible? ☒ ☐ ☐
- 7:26-9.4(d)5 Does the owner/operator inspect the container storage area at least daily, looking for leaks and for deterioration caused by corrosion or other factors? ☒ ☐ ☐
- 7:26-9.4(d)6 Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line? ☒ ☐ ☐

YES NO N/A

- 7:26-9.4(d)71 Are incompatible wastes, or incompatible wastes and materials placed in the same container? — ☒ —
- If yes, explain.
- 7:26-9.4(d)711 Are hazardous wastes placed in unwashed containers that previously held incompatible wastes? — ☒ —
- If yes, explain.
- 7:26-9.4(d)7111 Are containers holding hazardous waste that are incompatible with any waste or other materials stored nearby in other containers, open tanks, or surface impoundments separated from the other materials or protected from them by means of a dike, berm, wall or other device? — ☒ —
- 7:26-9.4(e)11 Are ignitable, reactive or incompatible wastes protected from sources of ignition or reaction? — ☒ —
- If no, explain.
- 7:26-9.4(e)111 Does the owner/operator confine smoking and open flames to specially designated locations when ignitable or reactive wastes are being handled? — ☒ —
- If no, explain.
- 7:26-9.4(e)1111 Does the owner/operator conspicuously place "No Smoking" signs whenever there is a hazard from ignitable or reactive waste? — ☒ —
- If the treatment, storage or disposal of ignitable or reactive waste, and the mixture of incompatible wastes and materials, conducted so that it does not:
- 7:26-9.4(e)21 Generate extreme heat or pressure, fire or explosion, or violent reaction? — ☒ —
- 7:26-9.4(e)211 Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health. — ☒ —

YES NO N/A

7:26-9.4(e)21i1	Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(e)21v	Damage the structural integrity of the device or facility containing the waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-9.4(e)2v	Threaten human health or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-11.2	<u>Tanks</u>			
	What are the approximate number and size of tanks containing hazardous waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Identify the waste treated/stored in each tank.			
	<u>General Operating Requirements</u>			
7:26-11.2(a)2	Are hazardous wastes or treatment reagents placed in the tank that could cause the tank or its inner liner to rupture, leak or corrode?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	If yes, please explain.			
	Are there leaking tanks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-11.2(a)2	Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-11.2(3)	Do uncovered tanks have at least two feet of freeboard or an adequate containment structure?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-11.2(a)4	If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank, e.g., bypass system to a standby tank?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7:26-11.2(c)	<u>Inspections</u>			
	Is the tank(s) inspected for:			
	1. Discharge control equipment (each operating day).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

YES NO N/A

	2. Monitoring equipment (each operating day).	—	—	—
	3. Level of waste in tank (each operating day).	—	—	—
	4. Construction of materials of the tank (weekly).	—	—	—
	5. Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures (weekly)?	—	—	—
7:26-11.2(e)	Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?	—	—	—
	If no, please explain.			
7:26-11.2(f)	Does it appear that incompatible wastes are being stored separate from each other?	—	—	—
7:26-9.2(b)	Are there underground tanks used to store hazardous waste?	—	—	—
	If yes, how many and can they be entered for inspection?	—	—	—
	Has the underground tank been in use on or before November 19, 1980? Specify Date.	—	—	—
	If no, when was the tank placed in use?			
7:26-9.2(b)31	Does the facility have a ground water monitoring plan approved by the department?	—	—	—
7:26-9.2(b)311	Is the use of the tank specified to the manufacturers recommended lifetime?	—	—	—
7:26-11.3	<u>Surface Impoundments</u>			
	Describe the design and operating features of the surface impoundment to prevent ground water contamination (e.g., liner leachate collection system).			N/A
	Give the approximate size of surface impoundments (gallons or cubic feet). Please specify the types of waste stored and treated.			

YES NO N/A

7:26-11.3(a)	Is there at least two feet of freeboard in the impoundment?	—	—	—
7:26-11.3(b)	Do all earthen dikes have a protective cover to preserve their structural integrity?	—	—	—
	If yes, please specify the type of covering.			
7:26-9.4(c)1	Does the owner/operator have a detailed chemical and physical analysis of a representative sample of the waste in the impoundment?	—	—	—
7:26-9.4(i)	Does the owner/operator place the results from each waste analysis and trial test, or the documented information, in the operating record of the facility?	—	—	—
7:26-11.3(d)	Does the owner or operator inspect:	—	—	—
7:26-11.3(d)1	The freeboard level at least once each operating day to ensure compliance with subsection 11.3(a)?	—	—	—
7:26-11.3(d)2	The surface impoundment, including dikes and vegetation surrounding the dike, at least once a week to detect any leaks, deterioration or failures in the impoundment?	—	—	—
7:26-11.3(f)	Is ignitable or reactive waste placed in the surface impoundment?	—	—	—
7:26-11.3(f)1	If yes, is the waste treated, rendered, or mixed before or immediately after placement in the impoundment?	—	—	—
7:26-11.3(f)11	Does the resulting waste, mixture, or dissolution of material no longer meet the definition of ignitable or reactive waste?	—	—	—

YES NO N/A

7:26-11.3(f)111	Is the waste treated, rendered or mixed so that it does not:			
7:26-9.4(e)21	Generate extreme heat or pressure, fire or explosion, or violent reaction?	—	—	+
7:26-9.4(e)211	Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health?	—	—	+
7:26-9.4(e)2111	Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion?	—	—	+
7:26-9.4(e)21v	Damage the structural integrity of the device or facility containing the waste?	—	—	+
7:26-9.4(e)2v	Threaten human health or the environment?	—	—	+
7:26-11.3(f)2	Is the surface impoundment used solely for emergencies?	—	—	+
7:26-11.3(g)	Are incompatible wastes, or incompatible wastes and materials placed in the same surface impoundment?	—	—	+
	If yes, is the waste managed so that it does not:			
7:26-9.4(e)21	Generate extreme heat or pressure, fire or explosion, or violent reaction?	—	—	+
7:26-9.4(e)211	Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health?	—	—	+
7:26-9.4(e)2111	Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk or fire or explosion?	—	—	+
7:26-9.4(e)21v	Damage the structural integrity of the device or facility containing the waste?	—	—	+
7:26-9.4(e)2v	Threaten human health or the environment?	—	—	+
7:26-11.4	<u>Landfills</u>			
	Identify the types of waste and size of the landfill.			
	<u>General Operating Requirements</u>			
7:26-11.4(a)1	Is run-on diverted away from all portions of the landfill?	—	—	+

		<u>YES</u>	<u>NO</u>	<u>N/A</u>
7:26-11.4(a)2	Is runoff from active portions of the landfill collected?	—	—	—
7:26-11.4(a)3	Is waste which is subject to wind dispersal controlled?	—	—	—
	Please explain how.			
7:26-11.4(a)4	Does waste disposal or the disposal operation occur within 200 feet (60.6 meters) of the property boundary?	—	—	—
7:26-11.4(a)6	Are untreated, ignitable, or reactive wastes placed in the landfill?	—	—	—
	If yes, explain.			
7:26-11.4(a)7	Are incompatible wastes, or incompatible wastes and materials placed in the same hazardous waste landfill cell?	—	—	—
	If yes, explain.			
7:26-11.4(a)8	Are bulk or non-containerized liquid waste or waste containing free liquids placed in a hazardous waste landfill?	—	—	—
	If yes:			
7:26-11.4(a)8i	Does the hazardous waste landfill have a liner which is chemically and physically resistant to the added liquid and a functioning leachate collection and removal system with a capacity sufficient to remove all leachate produced?	—	—	—
7:26-11.4(a)8ii	Before disposal, is the liquid waste or waste containing free liquids treated or stabilized, chemically or physically, so that free liquids are no longer present?	—	—	—
7:26-11.4(a)9	Are containers holding liquid waste or waste containing free liquids placed in a hazardous waste landfill?	—	—	—
	If yes:			
7:26-11.4(a)9i	Is the container designed to hold liquids or free liquids for a use other than storage, such as a battery?	—	—	—

YES NO N/A

7:26-11.4(a)911	Is the container very small, such as an ampule?	—	—	—
7:26-11.4(a)10	Are empty containers crushed flat, shredded, or similarly reduced in volume before it is buried beneath the surface of a hazardous waste landfill?	—	—	—
7:26-11.4(a)11	Does the owner or operator of a hazardous waste landfill continue to dispose of hazardous wastes subsequent to the detection of any liquid, in the secondary collection system?	—	—	—
7:26-11.4(b)	Does the owner or operator of a hazardous waste landfill maintain an operating record required in NJAC 7:26-9.4(i)?	—	—	—
7:26-11.4(b)1	Does the owner/operator maintain a map, the exact location and dimensions, including depth of each cell with respect to permanently surveyed bench marks?	—	—	—
7:26-11.4(b)2	The contents of each cell and the appropriate location of each hazardous waste type within each cell?	—	—	—
	Are containers holding liquid waste or waste containing free liquids placed in the landfill?	—	—	—
	Please describe the types and contents of such containers placed in the landfill.	—	—	—
	Are empty containers placed in the landfill crushed flat, shredded or similarly reduced in volume before they are buried?	—	—	—
	Are small containers of hazardous waste in overpacked drums placed in the landfill?	—	—	—
	If yes, please describe precautions taken to prevent the release of the waste.	—	—	—
7:26-11.5	<u>Incinerator</u>			
	What type of incinerator is at the site (e.g., waterwall incinerator, boiler, fluidized bed, etc.).			N/A

YES NO N/A

Is the residue from the incinerator a hazardous waste?

What types of air pollution control devices (if any) are installed in the incinerator unit?

Is energy recovered from the process?

If yes, describe.

What is the destruction and removal efficiency for the organic hazardous waste constituents?

7:26-11.5(b)1

Does the operating record include additional analysis and to determine types of pollutants which might be emitted including:

7:26-11.5(b)1i

Heating value of the waste?

7:26-11.5(b)1ii

Halogen and sulfur content?

7:26-11.5(b)1iii

Concentrations of lead and mercury?

7:26-11.5(2)

If no to any of the above questions, is there justification and documentation?

If operating, does it appear the incinerator is operating at steady state for conditions of operation, including temperature and air flow?

Monitoring and Inspection

7:26-11.5(c)1

Are existing instruments relating to combustion and emission controls monitored every 15 minutes?

If no, explain.

7:26-11.5(c)1

Does the incinerator have all the following instruments for measuring: Wastefeed, auxiliary fuel feed air flow, incinerator temperature scrubber flow, and scrubber pH? (Circle Missing Instruments).

If no, explain.

7:26-11.5(c)2

Is the stack plume observed visually at least hourly for opacity and color?

YES NO N/A

7:26-11.5(c)3	Are there any signs of leaks, spill and fugitive emission associated with the pumps, valves, conveyors, pipes, etc.?	—	—	—
	If yes, describe.			
7:26-11.5(c)3	Are all emergency shutdown controls and system alarms checked to assure proper operation?	—	—	—
	Is there any reason to believe the incinerator is being operated improperly? i.e., steady state conditions are not maintained.	—	—	—
	If yes, explain.			
7:26-11.5(c)3	Is the incinerator inspected daily?	—	—	—
7:26-11.6	<u>Thermal Treatment</u>			
	What type of thermal treatment is at the site (e.g., waterwall incinerator, boiler, fluidized bed, etc.).			
	List the types and quantities of hazardous waste thermally treated.			
	Is the residue from the thermal treatment unit a hazardous waste?	—	—	—
	What types of air pollution control devices (if any) are installed in the thermal treatment unit?			
	Is energy recovered from the process?	—	—	—
	If yes, describe.			
	What is the destruction and removal efficiency for the organic hazardous waste constituents?			
7:26-11.6(b)1	Does the operating record include additional analysis and to determine types of pollutants which might be emitted including:			
7:26-11.6(b)11	Heating value of the waste?	—	—	—
7:26-11.6(b)111	Halogen and sulfur content?	—	—	—
7:26-11.6(b)1111	Concentrations of lead and mercury?	—	—	—

YES NO N/A

7:26-11.6(2)	If no to any of the above questions, is there justification and documentation?	—	—	—
	If operating, does it appear the thermal treatment unit is operating at steady state for conditions of operation, including temperature and air flow?	—	—	—
	<u>Monitoring and Inspection</u>			
	Are existing instruments relating to combustion and emission controls monitored every 15 minutes?	—	—	—
	If no, explain.			
7:26-11.6(c)1	Does the thermal treatment have all the following instruments for measuring: Wastefeed, auxiliary fuel feed air flow, incinerator temperature scrubber flow, and scrubber pH? (Circle Missing Instruments).	—	—	—
	If no, explain.			
7:26-11.6(c)2	Is the stack plume observed visually at least hourly for opacity and color?	—	—	—
7:26-11.6(c)3	Are there any signs of leaks, spills and fugitive emission associated with the pumps, valves, conveyors, pipes, etc?	—	—	—
	If yes, describe.			
7:26-11.6(c)3	Are all emergency shutdown controls and system alarms checked to assure proper operation?	—	—	—
	Is there any reason to believe the thermal treatment unit is being operated improperly? i.e., steady state conditions are not maintained.	—	—	—
	If yes, explain.			
7:26-11.6(c)3	Is the thermal treatment inspected daily?	—	—	—
7:26-11.6(e)	Is there open burning of hazardous waste?	—	—	—
	If yes, what is being burned? (Only burning or detonation of explosives is permitted).			

YES NO N/A

If open burning or detonation of explosives is taking place, approximately what is the distance from the open burning or detonation to the property of others?

7:26-11.7

Chemical, Physical and Biological Treatment

(Other than in tanks, surface impoundments or plant treatment facilities).

Describe the treatment system at this facility and the types of wastes treated.

7:26-11.7(a)2

Does the treatment process system show any signs or ruptures, leaks or corrosion?

If yes, describe.

7:26-11.7(a)3

Is there a means to stop the inflow of continuously fed hazardous wastes?

Inspections

7:26-11.7(c)1

Is the discharge control safety equipment (e.g., waste feed cut-off systems, bypass systems, drainage systems and pressure relief systems) in good working order?

7:26-11.7(c)1

Are they inspected at least once each operation day?

7:26-11.7(c)2

Does the data gathered from the monitoring equipment (e.g., pressure and temperature gauges) show treatment process is operating according to design?

7:26-11.7(c)2

Is data gathered at least once each operating day?

7:26-11.7(c)3

Are construction materials of the treatment process inspected at least weekly to detect corrosion or leaking of fixtures and seams?

7:26-11.7(c)4

Are the discharge confinement structures (e.g., dikes) immediately surrounding the treatment unit inspected at least weekly to detect erosion or obvious signs of leakage (e.g., wet spots or dead vegetation).

YES NO N/A

7:26-11.7(e)1

Are ignitable or reactive waste fed into the waste treatment system treated or protected from any material or conditions which may cause it to ignite or react?

If yes, explain how.

7:26-11.7(f)

Are the incompatible wastes placed in the same treatment process?

If yes, please explain.

7:14A-6

Ground Water Monitoring

(Applies only to: Surface impoundments, landfills, land disposal facilities).

7:14A-6.2

Does the owner/operator have a ground water monitoring plan approved by the department and capable of determining the facility's impact on the quality of ground water?

If no, please explain.

How many monitoring wells has the facility installed?

What is the depth to ground water?

How many deep monitoring wells are on site? (Indicate depth of monitoring wells).

How many shallow monitoring wells are on site? (Indicate depth of monitoring wells).

7:14A-6.3(a)

Is the ground water monitoring system capable of yielding ground water samples for analysis?

If no, please explain.

7:14A-6.3(a)1

Are monitoring wells installed hydraulically upgradient?

If yes, specify how many and the depth of each.

YES NO N/A

7:14A-6.3(a)2

How many monitoring wells are installed hydraulically downgradient?

If yes, specify how many and the depth of each.

7:14A-6.4(a)

Does the owner/operator have a ground water sampling and analysis plan?

If no, please explain.

7:14A-6.4(a)

Does the plan include procedures and techniques for:

1. Sample Collection
2. Sample Preservation and Shipment
3. Analytical Procedures
4. Chain of Custody

List the types and quantities of hazardous waste incinerated.

7:26-9.4(b)3

Did the owner or operator submit the waste analysis plan to the Department?

If yes, when was the plan submitted?

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
ENFORCEMENT ELEMENT

CHECKLIST FOR REVIEW OF WASTE ANALYSIS PLANS
FOR COMPLIANCE WITH LAND DISPOSAL RESTRICTIONS

- | | YES | NO |
|---|----------|----------|
| I. Is a Waste Analysis Plan available for review? | _____ | <u>✓</u> |
| If yes and facility is generator with interim status or permit, continue with PART I. A, B and C. | | |
| If yes and facility is Commercial TSD, GO TO PART II. | | |
| If yes and facility is generator treating and disposing of their own waste, GO TO PART II and IV. | | |
| If no and facility is Commercial Transfer Station, GO TO PART III. | | |
| If no and facility is in generator only status, fill out PART I. A and B only. | | |
| A. Has facility determined whether waste is restricted from land disposal based solely on knowledge of waste? | _____ | _____ |
| If no, GO TO PART IB. | | |
| If yes, | | |
| 1. Are any chemicals used in facility's process(es) likely to produce a restricted waste stream(s)? | _____ | <u>✓</u> |
| If yes, explain below. | | |
| 2. Are the chemicals used as raw materials? | _____ | <u>✓</u> |
| If yes, list which ones below. | | |
| 3. Are solvents used ? | <u>✓</u> | _____ |
| <i>solvents not used in process, used in color quality check</i>
If yes, list which ones below.
<i>acetone, ethyl acetate</i>
<i>toluene</i> | | |
| 4. Has waste stream changed since the facility made its last determination about land restrictions ? | _____ | <u>✓</u> |
| If yes, explain below. | | |

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
 DIVISION OF HAZARDOUS WASTE MANAGEMENT
 ENFORCEMENT ELEMENT

	YES	NO
5. If generator claims solvent concentration is below action level, are analytical results available?	_____	_____ <i>N/A</i>
B. Has facility determined whether waste is restricted from land disposal by testing the waste or waste extract?	_____	_____
If no, facility is not in compliance.		
If yes, <i>The F waste are sent to SRS for Fuel blending disposal + SRS does analysis</i>		
1. Was the TCLP used?	_____	_____
2. Was the Paint Filter Liquids Test (PFLT) used?	_____	_____
If no to 1 & 2 facility is not in compliance.		
3. Has waste stream changed since last analysis?	_____	_____ <i>✓</i>
If yes, explain below.		
C. Does WAP specify how facility will comply with LDR?	_____	_____
For all restricted wastes?	_____	_____
If no, facility is not in compliance.		
II. Review of Commercial TSD WAP.		
A. Does WAP require the facility to analyze the first shipment of each waste type from each client?	_____	_____
B. Does WAP provide means of classifying potentially restricted wastes as:		
1. From off-site source?	_____	_____
2. Facility's own waste?	_____	_____
3. Waste to be shipped off-site?	_____	_____
C. Does WAP state what procedures will be used for periodic waste inspections after first shipment?	_____	_____
D. Are appropriate test methods specified in WAP?	_____	_____
E. Does WAP specify procedures for handling each type of restricted waste listed in manifests received?	_____	_____

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
ENFORCEMENT ELEMENT

	YES	NO
F. Is latest revision of WAP dated after 8 Jul 1987 ?	_____	_____
G. Does WAP specify that residue of restricted waste will be analyzed ?	_____	_____
H. If off-site treatment facility, does WAP specify that analytical data will be obtained from generator or previous handler of waste ?	_____	_____
I. Additionally, if TREATMENT facility,		
1. Does WAP specify the analysis to be performed on treatment residues ?	_____	_____
2. Does WAP address ALL residues (including those from non-hazardous wastes and non-restricted wastes) as potentially restricted wastes ?	_____	_____
3. Does WAP specify that residues will be evaluated from point of generation ?	_____	_____
4. If facility is INCINERATOR, does WAP specify that restricted DIOXIN wastes F020-F023 and F026-F028 will NOT be accepted ?	_____	_____
J. Additionally, if Off-site Land Disposal Facility,		
1. Does WAP state procedures for testing incoming waste shipments allowing facility to be certain that BDAT standards are met ?	_____	_____
If no, does plan state that customers must supply test results ?	_____	_____
2. Does WAP state that all waste analysis results and certifications will be maintained ?	_____	_____
3. Do operating records show instances of facility rejecting shipments ?	_____	_____
III. Facility is a Commercial Transfer Station		
Does facility store restricted waste for less than ten days ?	_____	_____
If no, requirements of PART II apply.		

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
ENFORCEMENT ELEMENT

	YES	NO
If yes, do operating records include		
1. Customer waste analysis results ?	_____	_____
2. Customer notifications ?	_____	_____
3. Customer certifications ?	_____	_____
IV. Facility is Generator treating and disposing of their own waste.		
In addition to requirements of part II,		
A. Is the WAP being implemented for both restricted wastes and their treatment residues ?	_____	_____
B. Does WAP specify that treatment residues will be tested for compliance with BDAT ?		
C. Does WAP specify that non-treated restricted waste will be tested prior to land disposal for BDAT compliance ?	_____	_____
D. Do operating records contain all testing records ?	_____	_____

APPENDIX A

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
carbon tetrachloride	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
chlorinated fluorocarbons	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
chlorobenzene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
trichlorofluoromethane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
1,1,2-trichloro-1,2,2-trifluoroethane	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
ortho-dichlorobenzene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
acetone	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl acetate	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl benzene	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
ethyl ether	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
methyl isobutyl ketone	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
n-butyl alcohol	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
cyclohexanone	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
methanol	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic?

☐ Yes ☒ No

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid
nitrobenzene

☐ Yes ☒ No
☐ Yes ☒ No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene
methyl ethyl ketone
carbon disulfide
isobutanol
pyridine

☒ Yes ☐ No
☐ Yes ☒ No
☐ Yes ☒ No
☐ Yes ☒ No
☐ Yes ☒ No

6. Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

- (a) Are the constituents used as chemical carriers?

☐ Yes ☒ No

If yes, list the constituents.

- (b) Are the constituents used for degreasing/cleaning?

☒ Yes ☐ No

If yes, list the constituents.

ethyl acetate for lab equipment

- (c) Are the constituents used as diluents?

☐ Yes ☒ No

If yes, list the constituents.

- (d) Are the constituents used as extractants?

☐ Yes ☒ No

If yes, list the constituents.

(e) Are the constituents used for fabric scouring?

____ Yes ☒ No

If yes, list the constituents.

(f) Are the constituents used as reaction and synthesis media?

____ Yes ☒ No

If yes, list the constituents.

If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.)

____ Yes ____ No

8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5%	methylene chloride
2%	trichloroethylene
25%	1,1,1-trichloroethane
<u>68%</u>	mineral spirits
100%	

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains only F003 constituents, it is a listed waste. For example:

33%	acetone
16%	methanol
<u>51%</u>	ethyl ether
100%	

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene (F003)
12%	TCE (F001)
<u>38%</u>	mineral spirits
100%	

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

APPENDIX B
TREATMENT STANDARDS FOR F-SOLVENTS

F001-F005 SPENT SOLVENTS	CONCENTRATION (IN MG/L)	
	WASTEWATERS	OTHER WASTES
Acetone	0.05	0.59
N-butyl	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cyclohexanone	.125	.75
1,2-dichlorobenzene	.65	.125
Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,2,2-Trichlor 1,2,2-trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

Inspector: Greenlich, Gary
Address: _____
Telephone No: 669-3960

RCRA LAND DISPOSAL RESTRICTION
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

A. Handler Name Cookson Pigments
B. Street (or other identifier) 256 Vanderpool St
C. City Newark D. State N.J. E. Zip Code 07114 F. County Name Essex
G. Nature of Business; Identification of Operations: SIC Code(s) Production of water based paint pigment
H. EPA ID # NJD002190627
I. Handler Contact (Name and Phone Number) Ralph Hennings Senior Engineer

II. GENERATOR COMPLIANCE

Comments

A. Waste Identification

1. F-Solvents

a. Does the handler generate the following wastes?

(i) ~~F001, F002, F004, or F005~~ Yes ☒ No

(ii) F003 Yes ☒ No

If an F003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic?

Yes ☐ No ☐

b. Source of the above: Form 8700-12 ☒; Part A ☐; Part B ☐; Biennial/Annual Reports ☒
other (specify) manifests

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent wastes, if such wastes were not identified by the facility previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identifying potentially

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

misclassified F-solvents, Appendix A-2 presents a list of corresponding P and U wastes. Note concerns below: _____

2. Dioxin wastes

- a. Does the handler report the generation of the following wastes? (The following industries may generate listed dioxin wastes: organic chemicals, pesticide or formulator.)

(i) F020 - F023, F026 - F027 ☐ Yes ☒ No

(ii) F028 ☐ Yes ☒ No

[F-solvent BD&T standards are presented as Appendix B]

3. California Waste Identification

- a. Does the facility handle any of the following wastes?

(i) D002 ☐ Yes ☐ No
(ii) D004 - D011 ☐ Yes ☐ No

N/A

- b. Does the generator handle any hazardous wastes characterized by high concentrations of halogenated organic constituents (HOCs), metals, or cyanides? ☐ Yes ☐ No

[California waste standards are presented as Appendix C]

- c. Is the generator handling any of the F, K, P, or U wastes subject to the "soft hammer" that may qualify as California wastes due to HOC, metals, or cyanide content? See Appendix D for a listing of California constituents likely to be found by waste code. ☐ Yes ☐ No

N/A

- d. Has the generator conducted the paint filter test (Method 9095) [§268.32(i)]? ☐ Yes ☐ No*

- e. Has the generator conducted any testing of these hazardous wastes to determine whether the concentrations qualify the hazardous wastes as California wastes? ☐ Yes ☐ No

If no, has the generator retained records documenting his "applied knowledge" that the hazardous waste is not a California waste?

☐ Yes ☐ No

2/ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

If "no" is answered to both parts of this question, a violation is indicated. [§268.7(a)]

Describe the nature of the records:

- f. Source of the above: Form 8700-12 _____; Part A _____; Part B _____; Biennial/Annual Report _____; other (specify) _____.

4. First Third Waste Identification

- a. Does the generator handle any of the wastes listed as First Third Wastes in §268.10? See Appendix E for listing. List First Third Wastes handled by the generator here: *N/A*
- _____
- _____

- b. Does the generator handle any soft-hammer wastes (Appendices D-1, D-2, and F)? If so, list those wastes:
- _____
- _____

- c. Are any of the soft-hammered wastes California wastes (see Appendix G)? ☐ Yes ☒ No

If yes, the wastes must meet BDAT standards prior to disposal.

- d. Has the Regional Administrator received demonstrations/certifications for all soft hammered wastes to be land disposed [§268.8(a)(2)]? ☐ Yes ☒ No*

- e. Source of the above: Form 8700-12 _____; Part A _____; Part B _____; Biennial/Annual Report _____; other (specify) _____.

B. BDAT Treatability Group - Treatment Standards Identification

1. Does the generator mix restricted wastes with different treatment standards for constituents of concern? ☐ Yes ☒ No
2. If yes, did the generator select the most stringent treatment standard for the constituent of concern [§268.41(b)]? ☐ Yes ☒ No*

*/ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

3. F Solvents -

- a. Did the generator correctly determine the appropriate treatability group [§268.41] of the waste (e.g., wastewaters containing solvents, nonwastewater (i.e., < 1% TOC), pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?
☒ Yes ☐ No*

4. California Wastes

- a. Did the generator correctly determine the distinction between liquid hazardous wastes and non-liquid hazardous wastes that contain HOCs in concentrations greater than 1,000 mg/kg [§268.32(h)]? *N/A*
☐ Yes ☐ No*

5. First Third Wastes

- a. Did the generator ascertain whether restricted wastes were appropriately assigned wastewater or nonwastewater designations (nonwastewaters are > 1% TOC and > 1% suspended solids) [§268.7(a)]? *N/A*
☐ Yes ☐ No*

- b. Does the facility handle K061 wastes?
☐ Yes ☐ No

If yes, were nonwastewaters appropriately classified in either the high or low zinc subcategories (≥15% Zn) [§268.7(a)] [§268.41(a)]?
☐ Yes ☐ No*

- c. Does the facility handle K101 or K102 wastes?
☐ Yes ☐ No

If yes, were nonwastewaters appropriately classified in either the high or low arsenic subcategories [§268.7(a)] [§268.41(a)]?
☐ Yes ☐ No*

- d. Is there any reason to believe that the generator may have diluted the waste to change the applicable treatment standard (based on review of process operation, pipe routing, point of sampling)?
☐ Yes ☐ No

2/ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

C. Waste Analysis - -

1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a):

a. Knowledge of wastes ☒ Yes ☐ No

(i) List wastes for which "applied knowledge" was used:

MSDS + Waste Profile Sheets

b. TCLP ☐ Yes ☒ No

(i) List wastes for which "TCLP" was used:

(ii) Appendix D lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any wastes handled by the generator subject to waste extract standards not tested using the TCLP? ☐ Yes ☐ No

If yes, list: _____

c. Total waste analysis ☐ Yes ☒ No

d. If files were retained, describe content and basis of applied knowledge determination:

If determined by TCLP or total constituent analysis, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: _____

Note which wastes were subjected to which tests:

Note any problems (e.g., inadequate analysis, variation of waste composition/generation for applied knowledge) _____

2/ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

- e. Were wastes tested using TCLP or total constituent analysis when a process or wastestream changed [§264.13(a)(3)(1) or §265.13(a)(3)(1)]?
____ Yes ____ No*

2. Did the restricted wastes exceed applicable treatment group treatment standards upon generation [§268.7(a)(1)]?

List those that exceeded standards: F003

List those that did not exceed standards: _____

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [§268.3]
____ Yes* ____ No

D. Management

1. Onsite management

- a. Were restricted wastes managed onsite?
____ Yes ____ No

If no, go to "2".

- b. For wastes that exceed treatment standards, was treatment in regulated units, storage for greater than 90 days, and/or disposal conducted?
____ Yes ____ No

If yes, TSDP checklist must be completed.

2. Offsite Management

- a. If restricted wastes exceed treatment standards, did generator provide treatment facility notification with each shipment? [268.7(a)(1)]:

(i) EPA Hazardous Waste Number? Yes ____ No*

(ii) Corresponding treatment standard?
____ Yes ____ No*

(iii) Manifest number? Yes ____ No*

(iv) Waste analysis, if available?
____ Yes ____ No

2/ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

Identify offsite treatment facilities _____
Safety Kleen

- b. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including:
- (i) EPA hazardous waste I.D. number? ☒ Yes ☐ No*
 - (ii) Corresponding treatment standard? ☒ Yes ☐ No*
 - (iii) Manifest number ☒ Yes ☐ No*
 - (iii) Certification regarding waste and that it meets treatment standards? ☒ Yes ☐ No*

Identify land disposal facilities receiving the BDAT certified wastes _____

- c. If the generator's waste is subject to a §268.5 case by case exemption, a §268.6 "no migration" exemption, or a nationwide variance (see Appendix E for restricted wastes subject to nationwide variances), does the generator's records indicate that he or she submits with each waste shipment [§268.7(a)(3)]: N/A

- (i) EPA Hazardous Waste Number? ☐ Yes ☐ No*
- (ii) Corresponding Treatment Standards? ☐ Yes ☐ No*
- (iii) All applicable prohibitions? ☐ Yes ☐ No*
- (iv) The manifest number? ☐ Yes ☐ No*
- (v) The date the wastes are subject to prohibitions? ☐ Yes ☐ No*
- (vi) Does generator keep records of all notifications/certifications sent to offsite facilities? ☐ Yes ☐ No*

2/ A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

List all prohibited wastes for which records are not provided per above [§268.7(a)(b)]:

Identify TSDFs receiving any prohibited wastes subject to any exemptions and variances:

- d. If handler generates a "soft hammer" waste, does the generator send with each "soft hammer" waste shipment to a TSDF and retain copies of, a notice that includes [268.7(a)(4)]: *N/A*

The EPA Hazardous Waste Number? ____ Yes ____ No*

Applicable prohibitions? ____ Yes ____ No*

The manifest number? ____ Yes ____ No*

Waste analysis data, where available? ____ Yes ____ No

- (i) Do the generator's records indicate that any soft-hammer wastes are destined for disposed in a landfill or surface impoundment [§268.33(f)]? ____ Yes ____ No

If yes, list facility of destination and waste of concern [§268.8(a)(2)]

- (ii) Has the generator submitted demonstrations and certifications for each "soft-hammered" waste destined to be disposed in landfill or surface impoundment to the Regional Administrator prior to the shipment of waste to the TSDF [§268.7(a)(2)]? ____ Yes ____ No*

- (iii) Has the generator retained a copy of the demonstration on site [§268.8(a)(3)-(a)(4)]? ____ Yes ____ No*

- (iv) Has the generator retained copies of all §268.8 certifications sent to the TSDF [§268.7(a)(6)]? ____ Yes ____ No*

• A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

- (v) Did the generator submit the demonstration to the receiving facility upon the initial shipment of the waste [§268.8(a)(3)-(a)(4)]? ☐ Yes ☒ No*
- (vi) If the Regional Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [§268.8(b)(3)]? ☐ Yes ☒ No*

E. Storage of Prohibited Waste

1. Were prohibited wastes stored for greater than 90 days? ☐ Yes ☒ No
- If yes, was facility operating as a TSD under interim status or final permit [§262.34(b)]? ☐ Yes ☒ No*

If yes, TSDF Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ☐ Yes ☒ No

If yes, list type of treatment unit and processes

If yes, TSDF checklist must be completed.

Facility Name: Cookson Pig.
ID Number: USD002190627
Inspector: Grenier
Date: 12/2/89

DRAFT
RCRA LAND RESTRICTION
TREATMENT, STORAGE, AND DISPOSAL REQUIREMENTS CHECKLIST

I. FACILITY IDENTIFICATION

A. Facility Name Cookson Pigments (prev. Heubach) B. Street (or other identifier) 256 Vanderpool Street
C. City Newark D. State N.J. E. Zip Code 07114 F. County Name Essex
G. Nature of business; identification of industrial and waste management operations; relevant SIC codes Production of water based paint pigment
H. EPA ID # USD002190627

I. Facility Contact (Name and Phone Number) Ralph Hennings Senior Engineer

II.A. For onsite facilities, complete the generator checklist

Comments

B. General Facility Standards

1. General

- a. Does the facility conduct waste analysis (total and TCLP) on-site or through a commercial laboratory?

Commercial lab (TSD)

ultimate

F waste is sent to SRS Linden for incineration after blend DOOSY H002 all sent for metal recovery

- b. Describe the frequency of sampling conducted by the facility.

2. Treatment Facilities

- a. Has the treatment facility revised its waste analysis plan [§268.7(b)] to meet the requirements of §264.13 or §265.13? Yes No*

- (i) Is the treatment facility conducting TCLP tests for wastes specified in Appendix A (i.e., those prohibited wastes subject to treatment standards expressed as waste extracts) per 286.7(b)(i)? Yes No*

N/A

* A potential violation is indicated

TSDF-1

Facility Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

- (ii) Is the treatment facility using the paint filter test for the California waste residues [§268.7(b)(ii)]? ☐ Yes ☐ No
- (iii) Is the treatment facility testing the pH of California waste residues? ☐ Yes ☐ No
- (iv) Is the treatment facility testing concentrations (not extracts) in the waste residues for prohibited wastes with established treatment standards expressed as waste concentrations [§268.7(b)(3)]? ☐ Yes ☐ No*
- (v) Is the treatment facility testing extracts of the waste residues for prohibited wastes having established treatment standards expressed as extract concentrations [§268.7(b)(1)]? ☐ Yes ☐ No*

3. Land Disposal Facilities

- a. Has the facility retained all notices and certifications from generators, storage and treatment facilities [268.7(c)(1)]? ☐ Yes ☐ No*
- b. Are wastes and waste residues tested for compliance with applicable treatment standards and prohibitions [§268.7(c)(2)]? ☐ Yes ☐ No* *N/A*
- c. Are they being tested in conformance with the frequency specified in the waste analysis plan [§268.7(c)(3)]? ☐ Yes ☐ No*
- d. Are the appropriate tests (TCLP vs. total waste) being used [§268.7(c)(2)]? ☐ Yes ☐ No*

C. Storage (§268.50)

1. a. Are restricted wastes exceeding treatment standards stored (excepting wastes subject to no migration exemptions, nationwide variances, case by case extensions, soft-hammered wastes)? ☐ Yes ☐ No *N/A*

If no, go to "c."

- b. Are all containers clearly marked to identify content and date(s) entering storage [§268.50(a)(2)]? ☐ Yes ☐ No*

* A potential violation is indicated

Facility Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

c. Do operating records track the location, quantity and dates that wastes exceeding treatment standards entered and were removed from storage [§264.73 or §265.73]? ☐ Yes ☐ No*

d. Do operating records agree with container labeling? [§268.50(a)(2) or §264.73 or §265.73] ☐ Yes ☐ No*

e. Is waste exceeding treatment standards stored for less than 1 year? ☐ Yes ☐ No

If yes, can you show that such accumulation is not necessary to facilitate proper recovery, treatment, or disposal? ☐ Yes ☐ No

If yes, state how: _____

f. Was/is waste exceeding treatment standards stored for more than one year? ☐ Yes ☐ No

If yes, state the owner/operator's proof that such storage was solely for the purposes of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal: _____

D. Treatment in Surface Impoundments (§268.4)

1. Are prohibited wastes placed in surface impoundments for treatment?

☐ Yes ☐ No

If no, go to E.

2. Is the only recognizable "treatment" occurring in the impoundment either evaporation, dilution, or both [§268.4(b) and §268.3]? ☐ Yes* ☐ No

3. Did the facility submit a certification of compliance with minimum technology and ground water monitoring requirements, and the waste analysis plan to the Agency [§268.4(a)(4)]? ☐ Yes ☐ No*

4. Have the minimum technology requirements been met [§268.4(a)(3)]? ☐ Yes ☐ No*

a. If the minimum technology requirements have not been met, has a waiver been granted for that unit(s) [§268.4(a)(3)(iii)]? ☐ Yes ☐ No*

* A potential violation is indicated

Facility Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

5. Have the Subpart R ground-water monitoring requirements been met [§268.4(a)(3)]? ☐ Yes ☐ No*
6. Have representative samples of the sludge and supernatant from the surface impoundment been tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan and are the results in the operating record for all wastes with treatment standards or prohibition levels [§268.4(a)(2)]? ☐ Yes ☐ No*
7. Did the hazardous waste residue (sludge or liquid) exceed the treatment standards or prohibition levels? ☐ Yes ☐ No
8. Provide the frequency of analyses conducted on treatment residues: _____

- Does the frequency meet the requirements of the waste analysis plan [§264.13 or §265.13]? ☐ Yes ☐ No*
9. Does the operating record adequately document the results of waste analyses performed [§264.13 or §265.13]? ☐ Yes ☐ No*
10. Have the hazardous waste residues that exceed the treatment standards and/or prohibition levels been removed adequately and on an annual basis [§268.4(a)(2)(ii)]? ☐ Yes ☐ No*
- a. If answer to 6 is no and supernatant is determined to exceed treatment concentrations, is annual throughput greater than impoundment volume? (note: sludge exceeding treatment standards must be removed) ☐ Yes ☐ No
11. If residues were removed annually, were adequate precautions taken to protect liners and do records indicate that inspections of liner integrity are performed? ☐ Yes ☐ No
12. When removed, were residues of restricted wastes managed subsequently in another surface impoundment? ☐ Yes ☐ No
- a. Were these residues subject to a valid 268.8 certification? ☐ Yes ☐ No*
13. When removed, were wastes treated prior to disposal? ☐ Yes ☐ No
- a. If yes, are waste residues treated on or offsite?
☐ Onsite ☐ Offsite

Facility Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

b. Identify management method _____

E. Treatment

1. Does the facility operate treatment units (regulated or exempt) (not including surface impoundments)?
____ Yes ☒ No

If no, go to "F."

2. Describe the treatment processes, including exempt processes.

3. Does the facility treat soft hammered wastes?
____ Yes ____ No

a. If yes, is treatment occurring as described in the generator's certification/demonstration [§268.8(c)(1)]?
____ Yes ____ No*

b. Did the treatment facility certify he treated the soft hammered waste as per the generator's demonstration and maintain copies of all certifications [268.8(c)(1)]?
____ Yes ____ No*

c. Did the treatment facility send a copy of the generator's demonstration and certification to the receiving treatment, recovery, or storage facility [§268.8(c)(2)]?
____ Yes ____ No*

4. Does the facility, in accordance with an acceptable waste analysis plan, verify that the residue extract from all treatment processes for the restricted wastes are less than treatment standards or prohibition levels [§268.7(c)(2)]?
____ Yes ____ No*

5. Describe frequency of testing of treatment residuals.

6. Was dilution used as a substitute for treatment [§268.3]?
____ Yes* ____ No

* A potential violation is indicated

Facility Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

7. Are all notifications, certifications, and results of waste analyses kept in the operating record [§264.73(b) or §265.73(b)]? ☐ Yes ☐ No*
8. Are notices provided to land disposal facilities complete with Waste Number, treatment standard, manifest number, and analytical data (where available) submitted for each shipment of waste or treatment residual that meets the treatment standard stating that waste has been treated to treatment performance standards [§268.7(b)(4) and (5) and §268.8(c)(1)]? ☐ Yes ☐ No*
9. If the waste or treatment residue will be further managed at another storage or treatment facility, has the treatment facility complied with the 268.7(a) notification and certification requirements applicable to generators [§268.7(b)(6)]? ☐ Yes ☐ No*

F. Land Disposal

1. Are restricted and/or prohibited wastes placed in land disposal units (landfills, surface impoundments** waste piles, wells, land treatment units, salt domes/beds, mines/caves concrete vault or bunker?) ☐ Yes ☐ No
2. Did facility have the notice and certification from generators/treaters in its operating record that all prohibited wastes disposed met standards for generation or treatment [§§268.7(c)(1); 268.7(a),(b)]? ☐ Yes ☐ No*

N/A

3. Did the facility obtain waste analysis data through testing of the waste to determine that the wastes are in compliance with the applicable treatment standards [§268.7(c)(2)]? ☐ Yes ☐ No*

If yes, was the frequency of testing as required by the facility's waste analysis plan [§264.13 or §265.13]? ☐ Yes ☐ No*

4. Were prohibited wastes exceeding the applicable treatment standards or prohibition levels placed in land disposal units [268.30] excluding national capacity variances [268.30(a)]? ☐ Yes ☐ No

If yes, did facility have an approved waiver based on no migration petition [268.6] or approved case-by-case or capacity extension [268.5] or treatment standard variance [268.44][§268.30(d), §268.31(d), §268.32(g), §268.33(e)]? ☐ Yes ☐ No*

* A potential violation is indicated

**Do not include SIs addressed under Section "D" of this checklist.

Facility Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

5. Were restricted wastes subject to a national capacity variance or case-by-case extension disposed? ☐ Yes ☐ No
- If yes, have the minimum technology requirements been met for all units receiving such wastes [§268.30(c), §268.31(c), §268.32(d), §268.33(d)]? ☐ Yes ☐ No*
6. Were adequate records of disposal maintained [§264.73(b) or §265.73(b)]? ☐ Yes ☐ No*
7. If wastes subject to a nationwide variance, case-by-case extensions [268.5], or no migration petitions [268.6] were disposed, does facility have generator's notices [268.7(a)(3)] and records of disposal? [§264.73(b) or §265.73(b)] ☐ Yes ☐ No*
8. If the facility has a case-by-case extension, can the inspector verify that the facility is making progress as described in progress reports? ☐ Yes ☐ No
9. If the owner/operator is disposing of a soft-hammer waste, is he maintaining the generators and treaters (if applicable) notices and certifications [§268.8(a)(2)-(a)(4)]? ☐ Yes ☐ No*
- a. Is the facility disposing of any soft hammer wastes that may be classified as California wastes? ☐ Yes ☐ No
- b. Did the facility seek to verify whether these wastes may be subject to all restrictions, e.g., California ban? ☐ Yes ☐ No

* A potential violation is indicated

TSDf-7

New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
Twin Rivers Professional Building
East Windsor, N.J. 08520

2 Babcock Pl W. Orange N.J. 07052
NOTICE OF VIOLATION


ID NO. NSD002190627 DATE Dec 12, 1989
NAME OF FACILITY Cookson Pigments
LOCATION OF FACILITY 256 Vanderpool St Newark, N.J.
NAME OF OPERATOR Ralph Hennings Senior Engineer

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION NJAC 7:26-9.8(d) failure of company
to submit registered professional engineer certification that
facility has closed in accordance with specifications in
approved closure plan

Remedial action to correct these violations must be initiated immediately and be completed by

Jan 12, 1990. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of \$25,000 per violation.


Division of Hazardous Waste Management
Department of Environmental Protection

Gary Brachuk
2 Babcock Pl.
W. Orange, N.J. 07052
669-3960